

**MEMO ENDORSED**

February 11, 2025

**VIA ECF**

Honorable Jessica G.L. Clarke  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1040  
New York, N.Y. 10007

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**Re: *U.S. Bank Trust Co., Nat'l Assoc. v. DISH DBS Corp. et al.*, No. 1:24-cv-3646**

Dear Judge Clarke:

We represent Defendants in the above-referenced matter and write to respectfully request (i) a 15-page extension of the 25-page limit for Defendants' forthcoming motion to dismiss Plaintiffs' Second Amended Complaint, and (ii) a 1-day extension of the deadline to respond to the Second Amended Complaint, from February 17, 2025 to February 18, 2025. Plaintiffs consent to both requests.

Defendants filed a 25-page brief in support of their motion to dismiss Plaintiffs' initial complaint on June 27, 2024. *See* ECF No. [22](#). On July 18, 2024, Plaintiffs filed an amended complaint, which raised various new allegations and included an additional count. *See* ECF No. [24](#). As a result, Defendants sought a 5-page extension of 25-page limit provided by Section 4(b) of Your Honor's Individual Rules, which the Court granted. *See* ECF No. [28](#). Most recently, on January 22, 2025, Plaintiffs filed the Second Amended Complaint, *see* ECF No. [50](#), which added a new defendant, raised new allegations concerning different corporate transactions, and included four additional counts (raising the total number of counts to 10). Defendants intend to address these four new counts and related points in their forthcoming motion to dismiss, and therefore respectfully request an additional 10-page extension of the current 30-page limit, for a total of 40 pages.

In addition, pursuant to the Court's January 21, 2025 Order, Defendants' deadline to move, answer or respond to the Second Amended Complaint is February 17, 2025. *See* ECF No. [48](#). Because that is a federal holiday, Defendants respectfully request, pursuant to Rule 2(e) of Your Honor's Individual Rules, a 1-day extension of time to respond to the Second Amended Complaint, until February 18, 2025. This is Defendants' first request for an extension of time and this request would not affect any other scheduled dates. As noted above, Plaintiffs consent to this request. The parties' next appearance before the Court is scheduled for August 27, 2025. *See* ECF No. [49](#).

Defendants are available to discuss any questions or concerns the Court may have.

Respectfully submitted,

/s/ Joshua D. Weedman

Joshua D. Weedman

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cc: All Counsel (via ECF)

Application GRANTED. Per Local Civil Rule 7.1(c), Defendants may file a memorandum of law in support of their motion to dismiss not to exceed 14,000 words. Plaintiff's opposition shall also not exceed 14,000 words. Defendants have until February 18, 2025 to respond to the Second Amended Complaint. The Clerk of Court is directed to terminate ECF No. 53.

SO ORDERED.



JESSICA G. L. CLARKE

United States District Judge

Dated: February 12, 2025

New York, New York